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2004 APR -8 AM 11:21 H. LaDon Baltimore

T.R.A. DOCKET ROOM

April 8, 2004

Tennessee Regulatory Authority  
Attn: Sharla Dillon  
460 James Robertson Parkway  
Nashville, TN 37238

**Via Hand Delivery**

Re Citizens Path II Disaggregation Plan of the Federal Universal Service Fund;  
Docket No. 04-00098

Dear Ms. Dillon

Enclosed for filing please find the original and thirteen (13) copies of the Motion of Ben Lomand Communications, Inc. for Extension of Time to File Comments in the above-referenced matter.

Please do not hesitate to contact me if you have questions or if we need to discuss this.

Sincerely,



H. LaDon Baltimore  
Ben Lomand Communications, Inc.

LDB/dcg  
Enclosures  
cc Parties of record  
Levoy Knowles

IN THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE

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IN RE:

CITIZENS PATH II DISAGGREGATION  
PLAN OF THE FEDERAL UNIVERSAL  
SERVICE FUND

DOCKET NO. 04-00098

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**MOTION OF BEN LOMAND COMMUNICATIONS, INC. FOR  
EXTENSION OF TIME TO FILE COMMENTS**

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Ben Lomand Communications, Inc ("BLC"), by its counsel, hereby requests that the time to comment on the Amended Disaggregation Plan of Citizens of Tennessee ("Citizens") in this docket be extended until April 30, 2004. As a provider of competitive telecommunications service and an Eligible Telecommunications Carrier in Citizens' serving area, BLC will be directly and potentially adversely affected by an action in this proceeding.

Although Citizens did amend its plan in October of 2003, BLC did not have notice when or whether the Tennessee Regulatory Authority ("TRA") would be taking comments until it received the TRA's Notice dated April 2, 2004, which provided only ten (10) days for the filing of comments on extremely complex issues regarding which Citizens has provided only minimal details. Because the plan is based, in part, on wire center costs as developed from forward-looking cost proxy models, Citizens' Costmap Wireline Model and the HAI v 5.0a model, which require specialized expertise to evaluate, BLC is not able to comment on the amended disaggregation plan in the very limited time provided by the Notice. BLC intends promptly to obtain such expert assistance and intends to provide substantive comment.

Such request will not delay the orderly proceeding of justice and will enable BLC to furnish the Tennessee Regulatory Authority with information upon which to determine a decision in this docket

Respectfully submitted,



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Washington, DC 20037  
(202) 296-8890  
*Counsel to Ben Lomand Communications, Inc.*

#### **Certificate of Service**

The undersigned hereby certifies that on this the 8th day of April, 2004, a true and correct copy of the foregoing has been forwarded via first class U. S. Mail, hand delivery, or overnight delivery to the following.

Ardmore Telephone Company, Inc.  
P.O. Box 549  
517 Ardmore Avenue  
Ardmore, TN 38449

BellSouth  
333 Commerce Street  
Nashville, TN 37201-3300

Century Telephone of Adamsville  
P O. Box 405  
116 N. Oak Street  
Adamsville TN 38310

Century Telephone of Claiborne  
P O. Box 100  
507 Main Street  
New Tazewell, TN 37825

Century Telephone of Ooltewah-Collegedale, Inc.  
P.O. Box 782  
5616 Main Street  
Ooltewah, TN 37363

Citizens Communication Company of Tennessee  
P O. Box 770  
300 Bland Street  
Bluefield, WV 24701

Citizens Communication Company of the Volunteer State  
P O Box 770  
300 Bland Street  
Bluefield, WV 24701

Loretto Telephone Company, Inc.  
P O Box 130  
Loretto, TN 38469

Millington Telephone Company, Inc  
P O. Box 429  
4880 Navy Road  
Millington, TN 38083-0429

Sprint-United  
112 Sixth Street  
Bristol, TN 37620

TDS Telecom-Concord Telephone Exchange, Inc  
P O. Box 22610  
Knoxville, TN 37933-0610

TDS Telecom-Humphreys County Telephone Company  
P O Box 552  
203 Long Street  
New Johnsonville, TN 37134-0552

TDS Telecom-Tellico Telephone Company, Inc.  
P.O. Box 9  
102 Spence Street  
Tellico Plains, TN 37385-0009

TDS Telecom-Tennessee Telephone Company  
P.O. Box 22995  
Knoxville, TN 37933-0995

TEC-Crockett Telephone Company, Inc.  
P.O. Box 7  
Friendship, TN 38034

TEC-People's Telephone Company, Inc.  
P.O. Box 310  
Erin, TN 37061


TEC-West Tennessee Telephone Company, Inc.  
P.O. Box 10  
244 E. Main Street  
Bradford, TN 38316

United Telephone Company  
P.O. Box 38  
120 Taylor Street  
Chapel Hill, TN 37034

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